REMARKS

The Applicants have carefully reviewed the Final Office Action mailed March 14, 2008 (hereinafter "Final Office Action") and offer the following remarks.

Initially, the Applicants wish to thank the Examiner for indicating that claims 10-14 and 26-30 would be allowable if rewritten in independent form. As will be detailed below, claims 1 and 17, the base claims from which claims 10-14 and 26-30 ultimately depend, are patentable over the cited references. Therefore, the Applicants will refrain from amending claims 10-14 and 26-30 at this time. Nevertheless, the Applicants reserve the right to rewrite claims 10-14 and 26-30 at a later time.

Claims 1-4 and 17-20 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,349,336 B1 to *Sit et al.* (hereinafter "*Sit*"). The Applicants respectfully traverse the rejection.

Prior to addressing the rejection, the Applicants provide herewith a brief summary of the present invention. The present invention provides a method and system for providing a computer running a Web browser with HTTP access to a peer server located behind a firewall in a peer-to-peer network. Particularly, a peer server multiplexes Web traffic between a firewall-protected peer server and a peer server that is not protected by the firewall. According to the present invention, in response to a proxy server receiving an HTTP request to access the peer server located behind the firewall from the web browser, the HTTP request is translated into a request packet and the request packet is sent to the peer server. In response to the peer server behind the firewall receiving the request packet, the peer server translates the request packet back into the HTTP request and then responds to the request, thereby enabling generic web traffic to flow. The Applicants submit that *Sit* does not disclose the features of translating a HTTP request into a request packet and sending the request packet to a peer server.

Now turning to the rejection, according to Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. § 102, "the reference must teach every element of the claim." The Applicants submit that *Sit* does not teach every element recited in claims 1-4 and 17-20. More specifically, claim 1 recites a method for providing a Web browser running on a computer with access to a peer server located behind a firewall comprising, among other features, in response to a proxy server receiving an HTTP request to access the peer server from the Web browser, "translating the HTTP request into a request packet and sending the request packet to

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the peer server." Claim 17 includes similar features. The Applicants submit that *Sit* does not disclose translating a HTTP request into a request packet and sending the request packet to a peer server, which is located behind a firewall. Instead, *Sit* discloses fooling a firewall in order to pass data to a browser, which is behind the firewall. More specifically, *Sit* discloses wrapping a request sent from a browser 314E to a web server 308I, which is behind a firewall 305, such that, to the firewall 305, the request appears as a response from the browser 314E to a request sent by the web server 308I. (*See Sit*, col. 7, ll. 50-57). As is well known, wrapping includes a header, which precedes encapsulated data and a trailer, which follows the encapsulated data such that the encapsulated data is not viewable to a firewall. Wrapping does not involve translating a HTTP request into a request packet. In fact, *Sit* teaches away from the present invention in that *Sit* discloses fooling a firewall into allowing the transmission of a packet by altering header information such that the packet appears as something it is not, i.e., instead of being a request, the packet appears as a response.

The Patent Office responds to this argument by stating that "the term 'translating the HTTP request into a request packet' under the broadest reasonable interpretation standard does not appear to be limiting in the sense as argued by the applicant."[1] The Patent Office goes on to state that the plain meaning of the term "translating" is a step to change into another form and the plain meaning of the term "request packet" is any packet including a request by a sender to a destination.[2] Thus, according to the Patent Office, a translation of a HTTP request into a request packet is any modification to a HTTP request into a packet, where the packet is changed into another form and includes a request from a sender to a destination.[3] The Patent Office goes on to state that this interpretation is consistent with paragraph **[021]** of the Specification.[4] The Applicants respectfully disagree for a number of reasons. First, in the interpretation noted above, the Patent Office has ignored all the features recited in claim 1. Specifically, the Patent Office is ignoring the feature of translating a HTTP request into a <u>request</u> packet and sending the <u>request</u> packet to a peer server, which is located behind a firewall. By stating "a translation of a HTTP request into a request packet is any modification to a HTTP request into a packet, where the packet is changed into another form, and where the packet includes a request from a sender to a

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[1] *See* Final Office Action, page 2.
[2] *See* Final Office Action, page 2.
[3] *See* Final Office Action, page 3.
[4] *See* Final Office Action, page 3.

destination," the Patent Office ignores the features of a request packet and sending a request packet.[5] As mentioned above, according to Chapter 2131 of the M.P.E.P., in order to anticipate a claim under 35 U.S.C. § 102, "the reference must teach every element of the claim." By ignoring the feature of a <u>request</u> packet recited in the claims, the Patent Office is ignoring its burden under 35 U.S.C. § 102.

Second, the Patent Office attempts to mask this shortcoming by stating that the interpretation given above is consistent with paragraph **[021]** of the Specification. However, the Applicants submit that the Patent Office is impermissibly broadly construing the features recited in claim 1. According to Chapter 2111 of the M.P.E.P., while claims should be given their broadest reasonable interpretation, the interpretation must be "consistent with the specification." The Applicant submits that the Patent Office is not interpreting claim 1 in a manner that is consistent with the Specification. In particular, paragraph **[021]** of the Specification states the following:

> [021]   FIG. 3 is a flow diagram illustrating the process for enabling a Web browser 30 to access the peer server 24' behind a firewall 34. The process begins in step 50 with the peer server 24 registering an outbound socket connection with the proxy server 36. In step 52, all incoming HTTP requests intended for the peer server 24' are redirected to the proxy server 36. In response to receiving a redirected HTTP request in step 54, the proxy server 36 finds the socket connection to the peer server 24', translates the HTTP requests into a **multiplexed protocol comprising a request packet**, and sends the request packet to the peer server 24'. In step 56, the peer node 26 receives the request packet, demultiplexes the request, converts the request packet back into the original HTTP request, and passes the HTTP request to the local Web server 28. In step 58, the peer node 26 receives an HTTP response from Web server 28, converts the HTTP response into a response packet, and sends the response packet to the proxy server 36 over the outbound socket connection. In step 60, the proxy server 36 receives the response packet from the peer server 24', converts the response packet back into the HTTP response, and sends the HTTP response to the requesting web browser 30 (emphasis added).

As shown above, paragraph **[021]** states that the HTTP request is translated into a multiplexed protocol comprising a request packet and sends the request packet to a peer server. Thus, the Specification explicitly states that HTTP request is translated into a request packet, not just a packet. Therefore, the Applicants submit that the Patent Office is interpreting the feature of, in response to a proxy server receiving a HTTP request to access the peer server from the

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[5] *See* Final Office Action, page 3.

Web browser, "translating the HTTP request into a request packet and sending the request packet to the peer server" in a manner entirely inconsistent with the Specification.

Third, even assuming *arguendo*, that the Patent Office's interpretation of the feature of translating a HTTP request into a request packet and sending the request packet to a peer server, which is located behind a firewall, was somehow correct, *Sit* still does not disclose all the features of claim 1, as interpreted by the Patent Office. Specifically, the Patent Office has acknowledged that the claim involves changing the packet into another form. *Sit* does not disclose this feature. As mentioned above, *Sit* involves wrapping a request with a header and a trailer. However, the packet itself is not transformed, or even changed, to use the nomenclature proposed by the Patent Office. For this reason and the reasons noted above, claims 1 and 17 are patentable over the cited reference. Likewise, claims 2-4, and 18-20, which respectively depend from claims 1 and 17, are patentable for at least the same reasons along with the novel features recited therein.

Claims 5-7, 15, 16, 21-23, and 31-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Sit*. The Applicants respectfully traverse the rejection. According to Chapter 2143.03 of the M.P.E.P., in order to "establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." The Applicants submit that *Sit* does not disclose all the features recited in claims 5-7, 15, 16, 21-23, and 31-34. As detailed above, *Sit* does not disclose all the features recited in claim 1 or 17, the base claims from which claims 5-7, 15, 16, 21-23, 31, and 32 ultimately depend. Therefore, these claims are patentable over *Sit* for at least the same reasons noted above with respect to claims 1 and 17, and the Applicants request that the rejection be withdrawn.

Claim 33 recites a method for providing a web browser comprising, among other features, in response to a proxy server receiving a redirected HTTP request, "translating the HTTP requests into a multiplexed protocol comprising a request packet, and sending the request packet to the peer server" and in response to a peer node receiving a HTTP response from the Web server, "translating the HTTP response into a response packet, and sending the response packet to the proxy server." Claim 34 includes similar features. As detailed above, *Sit* does not disclose translating a HTTP request into a request packet and sending the request packet to a peer server, which is located behind a firewall. Similarly, the Applicants have reviewed *Sit* and submit that *Sit* does not disclose translating a HTTP packet into a response packet and sending

the response packet to a proxy server. As such, claims 33 and 34 are patentable over *Sit* and the Applicants request that the rejection be withdrawn.

Claims 8, 9, 24, and 25 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Sit* in view of U.S. Patent No. 6,917,965 B2 to *Gupta et al.* (hereinafter "*Gupta*"). The Applicants respectfully traverse the rejection. The Applicants submit that neither *Sit* nor *Gupta*, either alone or in combination, discloses or suggests all the features recited in claims 8, 9, 24, and 25. As detailed above, *Sit* does not disclose all the features recited in claim 1 or 17, the base claims from which claims 8, 9, 24, and 25 ultimately depend. Moreover, *Gupta* does not overcome the previously noted shortcomings of *Sit*. Therefore, claims 8, 9, 24, and 25 are patentable over the cited references for at least the same reasons noted above with respect to claims 1 and 17, and the Applicants request that the rejection be withdrawn.

The present application is now in a condition for allowance and such action is respectfully requested. The Examiner is encouraged to contact the Applicants' representative regarding any remaining issues in an effort to expedite allowance and issuance of the present application.

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Respectfully submitted,

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